

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
Caption in Compliance with D.N.J. LBR 9004-2(c) Nicholas Poduslenko, Esquire Edmund M. George, Esquire Obermayer Rebmann Maxwell & Hippel LLP 1120 Route 73, Suite 420 Mount Laurel, NJ 08054 (856) 795-3300 (856) 482-0504 (fax) <i>Attorneys for Ron and Rima Seal</i>	
<b>In re:</b>  <b>MATHEW K. PIERSON</b>  <b>Debtor.</b>	<b>Chapter 7</b>  <b>Case No. 21-11080-KCF</b>
<b>RON AND RIMA SEAL</b>  <b>Plaintiffs,</b>  <b>v.</b>  <b>MATHEW K. PIERSON,</b>  <b>Defendant.</b>	<b>ADVERSARY NO. 21-1264</b>  <b><u>NOTICE OF PLAINTIFFS'</u></b> <b><u>CROSS-MOTION FOR</u></b> <b><u>SUMMARY JUDGMENT AND</u></b> <b><u>OPPOSITION TO</u></b> <b><u>DEFENDANT'S MOTION TO</u></b> <b><u>DISMISS ADVERSARY</u></b> <b><u>PROCEEDING PURSUANT</u></b> <b><u>TO F.R.C.P. 56, 12(b)(6) and</u></b> <b><u>8(a)(2)</u></b>

PLEASE TAKE NOTICE, that on \_\_\_\_\_, 2022, at \_\_\_\_\_ or as soon thereafter as he may be heard, Ron and Rima Seal (the "Seals" or the "Plaintiffs"), by and through their counsel, Obermayer Rebmann Maxwell & Hippel LLP, shall apply before the Honorable Kathryn C. Ferguson, Bankruptcy Judge for the United States Bankruptcy Court, District of New Jersey, for an Order Granting Summary Judgment in favor of the Plaintiffs and against Defendant and Debtor, Matthew K. Pierson ("Mr. Pierson" or the "Defendant") and denying Summary Judgment and Dismissal in favor of the Defendant, pursuant to Fed. R. Civ. P. 56 made applicable here by Fed. R. Bankr. P. 7056 (the "Cross-Motion").

PLEASE TAKE FURTHER NOTICE, that in support of the Cross-Motion, the Plaintiffs shall rely upon the Certification of Rima Seal, the Plaintiffs' Response to the Defendant's Statement of Undisputed Material Facts, the Plaintiffs' Brief and Supplemental Statement of Undisputed Material Facts in support of the Cross-Motion, and documentary evidence and/or oral testimony that may be appropriate or the Court may require on the return date of this Cross-Motion.

PLEASE TAKE FURTHER NOTICE, that all answering papers and/or objections, if any, to the relief sought herein must be made in writing and filed with the Clerk of the Bankruptcy Court at the United States Bankruptcy Court, and served upon the undersigned counsel for the Plaintiffs, four (4) days prior to the return date of the Cross-Motion, pursuant to Rule 90132(a)(2) of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the District of New Jersey.

PLEASE TAKE FURTHER NOTICE, that the Plaintiffs request oral argument on the Cross-Motion.

PLEASE TAKE FURTHER NOTICE, that should no objection be filed to the relief sought, the Court may enter the Order, in the form submitted herewith, granting such relief without a hearing.

**OBERMAYER REBMANN  
MAXWELL & HIPPEL**

By: /s/ Nicholas Poduslenko  
Nicholas Poduslenko, Esquire  
*Attorney for Plaintiffs*  
*Ron and Rima Seal*

Dated: February 22, 2022